Slaughter v. Jones Day Doc. 16 Att. 3

EXHIBIT A

PART 2

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Q. Okay. Other than the documents that you provided to your attorney that he provided to me this morning, did you review any other documents?
A. No.
Q. Before we took a break, we were discussing your employment with Jones Day; and I'd like to pick up there. Do you remember we discussed your 2001 evaluation and your 2002 evaluation? Do you remember recall that?
A. Yes, I do.
Q. Okay. Now I'd like to turn your attention to your 2003 evaluation.
A. Okay.
MR. PADGETT: What number are we on?
THE REPORTER: "14."
MR. PADGETT: Thank you.
(Slaughter Exhibit No. 14 was marked.)
Q. (By Ms. Clark) Ms. Slaughter, you've been handed what's been marked as Exhibit No. 14. If you will flip with me to the second page of the document. Is that your signature?
A. That looks like my signature.
Q. And did -- is there -- what's the date that appears next to what appears to be your signature?
A. 6-27-2003.

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Q. Do you -- while we're talking about your signature, do you have any reason to -- to doubt that this is your signature?
A. Not at this time.
Q. Okay. Do you recall receiving this document?
A. I did receive this document.
Q. Okay. And this is your 2003 performance appraisal, correct?
A. Correct.
Q. And this evaluation -- performance evaluation was given to you by Kevin Richardson; is that correct?
A. That is correct.
Q. Okay. Now, in this evaluation he indicated that you needed to improve your ability to assume a more active role in skill development and then -- and enhancement. Do you see that?
A. Yes, I do.
Q. Did you agree with that?
A. No, I did not.
Q. Okay. And also, he stated that you needed to improve your -- the effectiveness of your communication with department supervisor and office and firm administrative staff. Do you see that?
A. Yes.
Q. Did you agree with that?

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A. No.
Q. Was it your opinion that you communicated effectively with your supervisor and -- and the others in the office and firm administrative staff?
A. It was my opinion that I communicated very well with firm administrative staff and others within the office. Communication, as I had mentioned before, with my supervisor, who was Kevin Richardson at that time, was very difficult because he was bias.
Q. Refer with me to the second page.
A. (Witness complies.)
Q. Do you recognize these additional notes prepared by Kevin Richardson?
A. Yes, I do.
Q. Okay. Now, he acknowledged that you were a hard worker with a solid understanding of computer hardware and related technology. Do you see that?
A. Yes.
Q. Did you agree with that assessment?
A. Yes.
Q. But he also stated that notwithstanding your technical skills, you continued to struggle to keep organized and to effectively and timely communicate with him, lawyers, and staff. Do you see that?
A. Yes.

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Q. Did you disagree with that assessment?
A. Overall, as I pointed out, yes. Because my communication with lawyers, staff, and firm administration was -- was good.
Q. Okay. Now, he also indicated in this 2003 performance evaluation that it was his assessment that you needed to get better organized to manage workflow. Do you see that?
A. Yes.
Q. And he also stated that you should get rid of the junk in your office, GIS workroom, server room, and phone room. Do you see that?
A. Yes.
Q. Did you get rid of the junk that was in your office, GIS workroom, server room, and phone room?
A. The junk that he is speaking about was not junk. It was firm equipment that I had to maintain because I did not have a official storage area.
Q. Okay.
A. So it wasn't junk --
Q. Okay.
A. -- as he put it.
Q. Okay. Well, did you remove or move it out of your office?
A. I believe I removed some of what I could.

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Q. Uh-huh.
A. But again, we were very limited for space.
Q. Okay.
A. Space was -- was a problem in -- in the office.
Q. Okay.
A. So I didn't have a lot of places to -- to put the equipment and just -- we had two different systems at the time.
Q. Uh-huh.
A. And so there was a lot of extra stuff that came from the old infrastructure.
Q. He repeated again that you needed to effectively and timely communicate and that you needed to increase your participation and contribution on the firm GIS operation calls. Do you see that?
A. Yes, I do.
Q. Did you agree with his assessment here?
A. Okay. There are two different things here. As far as effectively communicating --
Q. Uh-huh.
A. -- I kept Kevin informed as much as I could, seeing it as though I was doing the job of two or three people at the time.
Q. Uh-huh.
A. I was constantly in his office. I was

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constantly sending him e-mail to keep him updated. As far as the increased participation and contribution on GIS operations calls, again, I was doing the job of multiple people. I participated in those operations calls. There were some calls, of course, that I missed due to the workload at the time. I was supporting the entire firm. I was supporting 70-some-odd people.
Q. It was clear from this evaluation that at least in his estimation, you needed to improve in certain areas. Is that fair?
A. No, that's not fair.
Q. Okay. Well --
A. I mean, that --
Q. -- let me re- -- let --
A. -- that's what he said.
Q. Okay. And -- and that's the question.
A. But it's not fair.
Q. Well, let -- let me rephrase the question.
With respect to Kevin Miller -- Kevin Richardson's assessment of your performance, as indicated in this 2003 evaluation, he believed that there were areas of your performance that needed to be improved.
A. Kevin believed that I needed to communicate with him more.

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Q. And he believed that you needed to become more organized, as indicated in this evaluation.
A. As indicated in the evaluation, that's what he believed.
Q. Okay. And -- and according to Kevin, he believed that effective communication and good organizational skills were paramount to effectively responding to the growing demands of the office, as indicated in this evaluation, correct?
A. That's what he believed --
Q. Okay.
A. -- and that's what he said --
Q. Okay.
A. -- in the document.
Q. But with respect to your characterization of your performance, you disagreed with his assessment.
A. I disagreed with the assessment as it relates to effective and timely communications; and as I pointed out before, communication is a two-way street. Kevin did not make it easy for me to communicate with him, but I did my best to effectively communicate with him. And I participated in the managerial calls, the operational calls as much as I could, which was quite a bit, considering the fact that I was doing the job of several people.

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Q. Who is Terry Crum?
A. Terry Crum is the former firm -- let me think on this to get his title right. He's probably called the GIS director, and Terry Crum was someone who was on his way out. In January of 2003 it was known firmwide that Terry Crum was not working out, and he was leaving the firm.
Q. How did you know that?
A. Because I have communication with various individuals in firm GIS or ISS, and that's what was rumored.
Q. In January, 2003, that Terry Crum was on his way out.
A. I -- I'd say on or -- or about that time. I can't say it was exactly January. Early part of 2003 that's what was going around the rumor mill.
Q. Okay. Did you work with Terry Crum?
A. I never ever worked with Terry Crum. Terry Crum and I -- he -- he worked in Cleveland. So to answer your question, no, I did not work with him.
Q. Did you have -- well, did you have any problems with him?
A. I met Terry Crum one time, and that was during the managers' meeting that I attended in 2002. Terry appeared to have a problem with me, but I did not have a

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problem with him.
Q. Why did he -- how did he appear to have a problem with you?
A. At the time, I participated -- we had a little group meeting, and we were talking about technology. I can't remember exactly what the presentation was regarding, but I was elected as the person in my group to get up and speak in front of the entire audience to tell our side of the story or to give our assessment. Once I did that, many individuals in the audience started clapping. It's my understanding from others that Terry Crum seemed to be irritated by that.
Q. Did you notice that he was irritated?
A. No. Because I was headed back to -- to my seat. So I -- I wasn't looking at him.
Q. Okay. So did he tell -- make any statements to you during that meeting?
A. Other than, "Hi, how" -- "how are you doing? Nice to meet you," just the general greeting that -- that anyone would give.
Q. He submitted an evaluation for you in 2003?
A. Yes.
(Slaughter Exhibit No. 15 was marked.)
Q. (By Ms. Clark) Do you recognize this document what -- that's been marked as Exhibit No. 15?

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A. Yes.
Q. Turn with me to the second page. Is that your signature?
A. Yes.
Q. And your job title is listed as technical support specialist. Do you see that?
A. Yes, I do.
Q. And you didn't make any changes to that, did you?
A. No.
Q. Refer with me to Exhibit No. 14. Your job title is listed as technical support specialist on the --
A. Technology.
Q. Excuse me. Technology support specialist on the 2003 --
A. Yes.
Q. -- evaluation?
And you didn't make any changes to that, did you?
A. No, I did not.
Q. Okay. Now, according to the evaluation that Mr. Crum provided regarding you, he noted that there appeared to be a disconnect between you and the global organization. Do you see that?

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A. I see that.
Q. And he states that you seldom attended conference calls. Was his assessment.
A. I see that.
Q. Did you agree with that?
A. I totally disagree.
Q. Did you -- is it your belief -- is it your testimony that you attended the conference calls?
A. I attended conference -- to say "seldom" would imply that I hardly ever participated or attend the calls. That is incorrect. I participated in the calls and attended as many calls as I could.
Q. He also noted that when you did attend the conference calls or partici- -- or attend the conference calls, you rarely participated or contributed to the call. Do you see that?
A. I see that.
Q. Did you agree with that?
A. No.
Q. He states that -- in this evaluation in 2003, that you were not as well-connected into the global organization as your peers and that as a result, that left you somewhat uninformed. Do you see that?
A. I see -- I see that.
Q. And that was his assessment of you.

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A. Right.
Q. Did you agree with that?
A. No.
Q. He states that at -- at times it was difficult to reach you by e-mail or phone. Do you see that?
A. Yes.
Q. Did you agree with that?
A. No, I do not. I -- Mr. Crum had never been to the Houston office, nor do I recall anytime when he would just attempt to call me directly. So I was pretty surprised by his comments.
Q. He stated that as the single GIS representative in Houston, you needed to work harder, in this 2003 evaluation, correct?
A. That's not correct. That's what he stated, that I needed to work harder.
Q. Right. I mean, that that's --
A. Yeah.
Q. -- what he stated.
A. Right.
Q. But you disagree with that?
A. I totally disagree with that.
Q. Okay. Did you provide a statement in response to his evaluation?
A. I don't recall.

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Q. Who is Aaron Gard.
A. Aaron Gard is one of our associates.
Q. Okay. And what level associate is he?
A. You mean how many years?
Q. Yes.
A. I'd say as of right now, he may be five- or six-year associate. I -- I don't really remember.
Q. Okay.
A. He's on the junior level, I would assume.
Q. Okay. Do you recall that he completed an evaluation for you in 2003?
A. Yes, I do.
(Slaughter Exhibit No. 16 was marked.)
Q. (By Ms. Clark) You've been handed what's been mark as Exhibit No. 16. Do you recognize this document?
A. Yes.
Q. Would you characterize this evaluation as a good evaluation by Aaron Gard?
A. I'd have to read it first.
(Witness examining document.)
Your question was would I consider that to be a good evaluation?
Q. Yes.
A. Yes.
Q. He made positive statements about a project in

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which you assisted him.
A. Right.
Q. Okay. Do you recall whether or not he was a first-year associate in 2003?
A. I don't recall.
Q. Okay. Do you have any complaints or problems with Mr. Gard?
A. No, I do not. I worked with him quite a bit, as he noted. He had moderate experience -- or moderate exposure to me.
Q. Uh-huh.
A. So he could evaluate me because he knew me and worked with me.
Q. Okay. But Kevin Richardson knew you and worked with you, as well, correct?
A. Aaron worked more closely with me because we were working on projects.
Q. Who was the partner assigned to this BP project? Do you recall?
A. I don't recall.
Q. Do you agree that the partner would have ultimate responsibility for the project and that Aaron would carry out his or her directives?
MR. PADGETT: Object to the form of the question.

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A. Would you please rephrase the question?
Q. (By Ms. Clark) Sure. As a first-year associate -- or junior associate, as you refer to him -- you would expect that he would take directive from his partner or the partner assigned or responsible for the BP project.
A. That would follow normal protocol.
Q. Okay. Did you file an internal complaint with Jones Day?
A. Yes.
Q. Okay. What was the first step that you took in filing your internal complaint?
A. From what I recall, the very first thing that I did was to -- I contacted HR.
Q. And with whom did you speak in HR?
A. The very first person that I voiced my complaints to was Stacey Brown.
Q. And what did you tell her?
A. I told her that I felt and I knew that my job was being taken away from me and that that wasn't right, that I was very hurt behind it. She went on to tell me she didn't understand why this was happening because I was already doing the job.
Q. And that's what Stacey Brown told you?
A. That is exactly what Stacey Brown told me. And

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at that particular time, I was so emotional that she asked me -- or she told me that I could contact the personal assistance program; and she also suggested that I go home that particular day --
Q. And did you?
A. -- which is --
Q. That's what you did?
A. That particular day I did go home, yes.
Q. Did you contact EAP?
A. Yes, I did.
Q. Okay. And with whom -- did you see someone there?
A. I spoke with someone through our EAP phone line, and what they did was referred me to various therapists that could help. And I did see a therapist.
Q. And who did you see?
A. I don't have the person's name right now.
Q. Okay. Was it a man or a woman?
A. It was a woman.
Q. And where is her office located?
A. She's in the Fort Bend County area.
Q. I'm sorry?
A. Fort Bend County area.
Q. How long did you see her?
A. I saw her for -- I think I had three -- three

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visits, maybe.
Q. And how often? How frequent were those visits?
A. They were -- it was one week, the next week. I mean, it was weekly.
Q. Okay.
A. But I -- I did not continue going to her.
Q. Okay. And you don't recall her name?
A. Not at this time.
Q. Which -- what type of therapist was she? Was she a social worker? A psychologist? A psychiatrist?
A. I think she was classified as a -- a psychologist, probably.
Q. So she didn't prescribe any medications for you?
A. No.
Q. Did she refer you to a psychiatrist or a treating physician who could or did prescribe any prescriptions for you?
A. She did not refer me to anyone, but I did seek someone.
Q. From whom did you seek help -- help?
A. I went to a -- a clinic that was called MedCure -- or MedCare Clinic, is what it's called.
Q. And where is it located?
A. Off of Bissonnet.

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Q. Okay. And -- and who did you see?
A. I believe I initially saw Dr. Keshwani.
Q. Can you spell that for me?
A. K-e-s-h-w-a-n-i.
Q. Uh-huh.
A. And that's who I saw --
Q. And when was --
A. -- at that time.
Q. And when was this?
A. This was in the fall -- or fall of 2003. I would say this was in November or December. More than likely, November.
Q. Okay. Did he prescribe any medications for you?
A. Yes, he did.
Q. And what did he prescribe?
A. Prozac.
Q. Did you take it?
A. Yes, I did.
Q. How long did you take it?
A. I've got the prescription refilled two or three times. So I would say I took it for three months, four months, maybe.
Q. How often did you see Dr. Keshwani?
A. The second time around, I think at that time I

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was going maybe every couple of weeks; but the -- the second visit I -- I didn't actually see him. He was the head doctor. He -- he -- next time around I saw some underling, and I can't remember the exact name.
Q. A resident or --
A. Yes.
Q. -- doctor in his office?
A. Exactly.
Q. But it was a male.
A. It was a male.
Q. And how long did you see this person?
A. For, as I said, you know, maybe -- during the -- the entire time that I was on the medication.
Q. Uh-huh.
A. But this -- these were not regular visits. I mean, of course, once you run out of the prescription, in order to get it refilled, you go back and visit. So I -- I would say total I visited them maybe four or five times.
Q. And then after three months, you stopped taking Prozac and you stopped seeing the physician?
A. It was three or four months, somewhere around that time, yes.
Q. Did --
A. And I stopped taking Prozac.

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Q. Okay. And did you see another -- did you start seeing another physician?
A. No, I did not.
Q. Okay. So since second quarter 2004 to this point, 2006, have you seen any other physicians, psychologists, social workers, therapists, psychiatrists?
A. For other things. But -- but, I mean, I was in the hospital in 2004.
Q. Okay. Was that in any way related to your employment at Jones Day?
A. I don't really know the answer to that. I mean, I -- I can tell you this: I -- my appendix ruptured. And I do attribute a lot of what I was going through at that time was just stress-related because I was under so much stress at the time.
Q. Okay. Other than being treated for the appendix, did you see any healthcare practitioners, clinicians, therapists, social workers, psychologist, psychiatrist, after first quarter of 2004?
A. Let me think. Not that I can recall.
Q. Did you contact -- after you spoke with Stacey Brown and she asked you to -- invited you to go home and call EAP, did you speak with anyone else in HR about your complaints?

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A. **Yes, I did.**
Q. And who did you speak to?
A. **David Williams.**
Q. Okay. Now, was this a telephone call?
A. **Yes, it was.**
Q. Did you call him up and -- did you send him an e-mail asking to schedule a conference call, or did you call him up and then relay your concerns to him?
A. **I called him up, and I left him a voice mail.**
Q. Okay. Did he return your call?
A. **Yes, he did.**
Q. And what happened during that call?
A. **You want me to paraphrase basically what I said to him?**
Q. Yes.
A. **From what I recall, I called him up, tearful, crying. You know, totally frantic, expressing my concerns. I told him that I had been the manager of the Houston office, had been doing the job for three years. My job was being taken away from me and that I was told that Jerri Del Riesgo was going to be taking over my position. I did not feel that this was right. I felt that I was -- you know, and knew that I was discriminated against. Jerri did not have the kind of experience that I had. And, you know, our -- our voice**

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mail system only allows for -- for three minutes. So I -- I probably -- you know, it was something like that. But he did call back; and when we spoke on the phone, our conversation was a lot longer.
Q. Okay. And at some point during the conversation, did he ask you to put your concerns in writing?
A. **Yes, he did.**
Q. And did you do that?
A. **Yes, I did.**
THE REPORTER: "17."
(Slaughter Exhibit No. 17 was marked.)
Q. (By Ms. Clark) You've been handed what's been marked as Exhibit No. 17. Do you see that?
A. **Yes.**
Q. And if you refer with me to the bottom right-hand corner, you'll see a number there that states "000024"?
A. **Yes.**
Q. Okay. I'll represent to you that that's a label that -- that your attorney or one of his assistants placed on the documents that he sent to us.
A. **Okay.**
Q. Okay. Do you recognize this document?
A. **Yes, I do.**

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Q. And what is it?
A. **It's a discrimination complaint.**
Q. And is this the complaint that you put in writing after you spoke with David Williams?
A. **It looks like the document.**
Q. Okay.
A. **Yes.**
Q. And if you turn with me to the next page, you will see another number, "25." And again, I'll represent to you that that's the number that your attorney or his assistant placed on documents that he produced to us.
A. **Okay.**
Q. Okay. Let -- let's go through the complaints that you raised in November, 2003, with Mr. Williams.
A. **Okay.**
Q. You -- you state in your complaint -- your written complaint that -- well, you thanked him for taking the time to confer with you by telephone the previous week. So this, I take it, was prepared approximately a week later or within a week after you had your telephone conference with David Williams; is that right?
A. **That's -- that would probably be right, yes.**
Q. Okay. And you -- you state that Kevin

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Richardson called you into your office to advise you that a decision had been made to hire a GIS manager. You see that?
A. **Yes. He called me into his office.**
Q. Okay. Now, when did that meeting occur?
A. **That was sometime in October, I believe.**
Q. And you state here that he -- you were not encouraged to apply for the position. You see that?
A. **That is correct.**
Q. What do you mean, you were not encouraged to apply for the position?
A. **What I mean is at that particular time I asked Kevin, "How could you be hiring a manager when I'm already the manager?"**
Q. Uh-huh.
A. **He proceeded to tell me, "Well, I don't" -- "I don't know if this will be something that" -- "that you would be interested in. It's" -- "it's involving a higher level of responsibility."**
And I said to Kevin, "How could it be any higher than what it already is? Because I'm doing the job by myself. I had asked you several times for assistance." I went on to tell him that we were not -- according to the ratio, the staffing ratio that had came out earlier in the year, that we were not at the point,

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the head count, to justify the addition of another person.

And he just said, "Well, you know, I" -- "I just feel like, you know, you really need to" -- "to think seriously about whether or not you want to apply for this."

Again, I reiterated the fact that I was doing the job. I was the manager. So that's --

Q. Now -- I'm sorry.

A. Okay. That's -- that's basically what I mean. But there -- there were some more things that happened, but we'll probably get to that later. Because they involve Stacey Brown. So . . .

Q. Okay. Well, we can -- now is just a -- as good a time as any. But let me make sure I understand.

It had been your position that -- or your belief that you were doing the job of multiple people, correct?

A. That is correct.

Q. And that to be effective in that role, there needed to be additional -- an additional person or persons.

A. It was my opinion -- or it -- I knew to be more effective -- I was effective. But to be more effective, that I needed the support.

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Q. Okay. So the fact that a -- another person was being hired in that department did not come as a surprise to you, considering it had been your belief that you needed someone else there to help.

A. That's incorrect.

Q. Okay.

A. The fact that someone was being hired as a manager when I was the manager was a surprise.

Q. Okay. But -- but you agree that based on how -- your assessment of that role and what you were expected to do, there needed to be someone else, that you -- you were handling the position of -- the responsibilities of several people. Is that what -- isn't that what you testified to?

A. What I agreed to is the fact that since I was already fulfilling the role and the position as the manager, there did need to be someone else to assist, such as when Tammy was there, Tammy assisted me.

Q. Okay.

A. So that's what I was agreeing to.

Q. What else occurred in this meeting with Kevin Richardson that involved Stacey Brown that you alluded to earlier?

A. It did not occur in this particular meeting. It was the next morning. But I'd like to point out, in

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this meeting, Kevin was very adamant about the fact that he did not think that this was something that I would want to do. And I reiterated the fact that I was already doing the job.

Q. Okay.

A. I went to Stacey.

Q. Okay. Before we talk about Stacey, let me ask a follow-up question.

Notwithstanding Kevin's statements during this meeting, you did apply for the position, correct?

A. I did apply because Stacey told me to apply.

Q. Okay. Now, the next morning, you had a meeting with Stacey Brown, the HR representative?

A. I actually had the meeting with Stacey, from what I recall, that evening because I was very upset.

Q. Okay. And -- and I -- I may have misunderstood. I thought it was the -- you said the next morning.

A. Right. I know. But Kevin confronted me the next morning after I talked to Stacey.

Q. Okay. Well, let's talk about the -- the meeting with Stacey Brown. Did you -- after you left Kevin Richardson's office, did you go to Stacey Brown's office? Or how did that meeting occur?

A. I went to Stacey Brown, yes, very upset, to

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tell her that I -- I wanted to see a job description.

Q. Okay. Now, is this the same conversation that occurred, that you testified to earlier, during which at some point Stacey Brown encouraged you to go home and to see -- to contact the EAP?

A. No.

Q. Okay.

A. No. But that -- she -- she did that after I was told that my job was being taken away.

Q. Okay. Thank you for clarifying.

So you went to Stacey Brown and asked to see a job description.

A. Yes.

Q. And how did she respond?

A. She was surprised.

Q. Did she provide a job description?

A. She did not give me a job description at that -- at that particular time. She said what she needed to do was to look at the job description. Because my question was to her, "How could this be happening when I'm already doing the job?" And, of course, she reiterated that fact. She did say that I needed to submit a resume to apply for the position. I told her that I was going to put on my resume that I was already the GIS manager, and Stacey said that I probably

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should not do that because that would ruffle some feathers.
Q. Did you ask her what she meant by that?
A. No, I did not.
Q. Okay. So did you follow her advice and not put "GIS manager" on your resume?
A. That's what I did.
Q. Okay. But you completed an application and submitted a resume for the -- to apply for the GIS manager position.
A. I -- I completed a resume. I, per Stacey Brown, put on my resume "technology support specialist" and I asked her to give me information as to what was different since there was supposed to be a difference. She could not provide me with that information. She said, "You're already doing the job."
Q. And in here -- in the -- your complaint to Mr. Williams, you state that the job opening was published in the Houston Weekly Bulletin on September 19, 2003; is that correct?
A. That's correct.
Q. Now, in the next paragraph you state that you felt that you were being forced to apply for a job that you already had and that it was demeaning to put you in such a position.

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A. (Witness nods head.)
Q. And that's what you've testified to today and -- and when we last met, correct?
A. That's correct.
Q. Okay. You were allowed a -- an opportunity to interview for the position, correct?
A. I did interview for the --
Q. Okay.
A. -- position.
Q. And with whom did you interview?
A. I interviewed with Kevin Richardson, Mark -- Mark Metts, Hugh Whiting, and Scott Cowan.
Q. Okay. I believe you testified that Mr. Whiting was the partner in charge of the Houston office?
A. That is correct.
Q. Who is Scott Cowan?
A. Scott Cowan is -- he -- he's a partner.
Q. Uh-huh.
A. I think he became a partner or he was made partner around that time.
Q. Uh-huh.
A. But he's a partner.
Q. Do you know what -- in which department?
A. He's in litigation.
Q. Had you worked with him before?

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A. Not much.
Q. Had you filed any complaints against him?
A. Had I filed any complaints against --
Q. Scott --
A. -- Scott Cowan?
Q. Yes.
A. No.
Q. Had you had any type of confrontations with him? Any fights? Any disagreements?
A. We had an -- one instance. I wouldn't necessarily call it a confrontation per se. But it had to do with his BlackBerry. And from what I recall, I had to jump through some enormous hoops for Scott Cowan because of his schedule, and I remember -- I vaguely remember either working probably till about 10:00, 11:00 o'clock one night before going on vacation for him.
Q. Uh-huh.
A. Because of his demands.
Q. Did you resolve it?
A. I did resolve it.
Q. Other than that extensive project or assignment, did you have any other run-ins with Mr. Cowan?
A. Not that I can recall.
Q. How about Mark Metts? Who is he?

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A. He's a partner --
Q. Okay.
A. -- as well.
Q. Did you get along with Mr. Metts?
A. Yes, I did.
Q. Any disagreements, complaints about him?
A. Not that I can recall.
Q. And we've talked about Kevin Richardson, who was your supervisor?
A. Uh-huh.
Q. After your interviews with Hugh Whiting, Scott Cowan, Mark Metts, and Kevin Richardson, the decision was made that you would not be -- you were not selected for the GIS manager position, correct?
A. The decision was made to take my job away.
Q. Okay. Do you recall your interview with -- with Hugh Whiting?
A. Yes. You're talking about my initial interview?
Q. Okay. Well, how many interviews did you have with Hugh Whiting regarding the GIS manager position that was posted in September, 2003?
A. I had two different discussions with Hugh Whiting. One was my interview.
Q. Right. And -- and --

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A. My --
Q. Right. So you had an interview with him; and then after the decision was made, you had a meeting with him.
A. Yes.
Q. Okay.
A. That is correct.
Q. But for now let's just talk about the -- the interview, and then we'll talk about that meeting.
A. Okay.
Q. Do you recall the interview that you had with Hugh Whiting?
A. I recall a lot -- or some portions of it, yes.
Q. Okay. Is there anything about that interview that stands out in your mind?
A. Well, I thought it was very odd that the interview was being conducted with the door open; but --
Q. Now, and why did you find that odd?
A. Because the door was not open for the other candidates that he interviewed.
Q. And -- and how do you know that?
A. Because of where I sat. Because I -- I sat in a -- in a closet. I was moved from Hugh Whiting's off -- I used to sit next to Hugh Whiting, and they moved me into a space that was about a third of the

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size. And where I was sitting, I could actually see his door.
Q. When did -- when were you moved from the space next to Hugh Whiting to the -- the smaller space?
A. Soon after Hugh Whiting moved to Houston.
Q. Okay. After the combination of the two firms?
A. Yes. It was sometime after that.
Q. Okay. During -- during the interview, although the door was open, did that hinder or limit your ability to answer his questions, the fact that the door was open?
A. Well, you could hear people, of course, walk -- walk past. You know, where I was sitting, you'd hear footsteps and stuff. It -- it certainly affected me; but to say -- to give you a percentage of how much it affected me, I can't do that.
Q. Okay. So other than the fact that he conducted the interview with the door open, is there anything else about the interview with Hugh Whiting that stands out in your mind?
A. He focused a lot on Coastal, the Coastal Corporation and my role at Coastal. And I -- I thought that -- the only thing I can conclude, maybe he -- he was trying to see similarities between my position at Coastal and the -- the role that I was already in --

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Q. Okay.
A. -- as GIS manager.
Q. Okay.
A. But there's nothing else that I can think of that was different.
Q. He -- was he courteous to you during the interview?
A. When you consider his personality, that he probably was being courteous --
Q. Okay.
A. -- considering his personality.
Q. How about your interview with -- with Mark Metts? Does anything stand out in that interview?
A. No. Nothing stands out.
Q. Was the door open or closed?
A. It was closed.
Q. Did he make any inappropriate statements to you or ask you inappropriate questions during that interview?
A. No.
Q. Was he courteous to you?
A. Yes.
Q. How about Scott Cowan? Anything about that interview with Scott Cowan that stands out in your mind?
A. What stands out was the fact that he seemed to

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be, I guess, sympathetic, so to speak, to -- to what was going on. And he said that something similar happened to him when he was -- he was a partner at Porter & Hedges, and then he had to -- when he moved to -- to Jones Day, he had to basically work his way back up. And it -- and I kind of wondered why he -- he pointed that out or --
Q. Did --
A. -- mentioned that scenario, but I think it just had to do with the fact that he knew I was already doing the job.
Q. That's your belief?
A. That's my belief.
Q. Okay. Did you --
A. And that --
Q. -- ask him -- did you ask him any questions? Did you ask him, you know, "Why are you sharing this information with me?"
A. No, I did not.
Q. Okay. Other than his mentioning or providing information regarding his experience at Porter & Hedges and then at Jones Day, does -- is there anything else that stands out in your mind?
A. No.
Q. Was he courteous to you?

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A. Yes.
Q. The questions asked were appropriate questions?
A. I believe so. I mean, I -- I can't really even tell you what the questions were.
Q. Right. But I'm -- but as you sit here today, nothing stands out in your mind that was inappropriate or not the type of questions that are asked during interviews.
A. Nothing that he asked me stands out, no.
Q. Okay. How about your interview with Kevin Richardson? Is there anything about that interview that stands out in your mind?
A. Yes. And that is, that one of the very first things that Kevin mentioned to me was that after all this time, he had never taken a look at my resume, which I thought that was odd, being a manager, that that would be one of the -- the first things that you would want to do, is get to know those people that report to you. But I -- I felt during the interview that he was solely just going through the motions.
Q. Did he ask you a series of questions?
A. He asked some questions. I can't -- I can't tell you exactly what the questions were right now.
Q. Okay. Was he courteous to you during the interview?

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A. He was somewhat courteous. Not as courteous as Mark and Scott, but . . .
Q. Now, after the decision was made to put Jerri Del Riesgo in the position, I believe you testified that you went back to speak with Hugh Whiting about that decision.
A. That is correct.
Q. Okay. How did you first learn at -- that Jerri Del Riesgo was being placed in the position?
A. I -- from what I recall, Hugh Whiting set up a meeting.
Q. With you?
A. With me.
Q. And what happened in that meeting?
A. He proceeded to tell me that Jerri was going to -- Jerri Del Riesgo from the Columbus office had -- had been offered and accepted my position, basically, my position as GIS manager, that she would be moving very soon. And I asked him why was Jerri -- or why had Jerri been selected.
Q. Okay. Now, before you tell me what he -- how he answered that question, let me follow up with you to make -- to make sure that I'm clear.
You stated that he told you that Jerri Del Riesgo was going to accept your position. Did he use

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those words? Did he state, quote, "Jerri Del Riesgo is going to assume your position"?
A. No, he did not use those words.
Q. Okay. And I just want to make sure that I'm clear and that the jury is clear.
A. Okay.
Q. Did he state to you that Jerri was going -- had been extended and had accepted the GIS manager position?
A. Yes.
Q. Okay. But you believed that she was taking your position.
A. That is correct.
Q. Okay. And you then testified you were -- you stated that you asked him, "Why was she selected?"
A. That's correct.
Q. And what did he -- how did he respond?
A. He said that Jerri had been with the firm or worked in the Columbus office for quite some time and that she was selected because of her connections within the firm.
Q. Did you doubt these reasons? Had she been with the firm in the Columbus office for a long time?
MR. PADGETT: Object to the form of the question.
Q. (By Ms. Clark) I'm -- I'm just following up on

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your -- on your testimony.
MR. PADGETT: I -- and the reason, my objection is there's two questions there. We don't need an explanation as to what she's doing. It's just there's two questions. So it's unclear what question is being asked.
MS. CLARK: Okay.
Q. (By Ms. Clark) Do you need me to repeat it?
A. Rephrase the question --
Q. Sure.
A. -- please.
Q. Had Jerri been with the firm for a long time, as Hugh Whiting stated, to your knowledge?
A. To my knowledge, Jerri worked as a secretary for several years for the Columbus office and had been in the TSS department as an assistant for maybe two years -- two or three years.
Q. So it's -- it was your understanding that she'd been with the firm for five years or longer?
A. I don't know exactly how many years. More than five years, I believe.
Q. Okay. Now, when she applied for the GIS manager position, she was not in the role of secretary, was she?
A. She was an assistant.

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Q. Okay. Now, in the GIS department?
A. That is correct.
Q. Did you supervise her?
A. Did I supervise her?
Q. Yes.
A. She was in Columbus.
Q. Okay. So that -- the answer is "no"?
A. No.
Q. So you don't have any personal knowledge of her responsibilities and her performance in the Columbus office as you sit here today, do you?
A. I have some knowledge of it because I had a relationship with her supervisor.
Q. Okay. And -- but my question is whether or not you have personal knowledge, not based -- not information that you may have received from someone else. Information that you gathered yourself by either evaluating her, assigning her tasks, et cetera.
MR. PADGETT: I'm going to object to the form of the question.
MS. CLARK: Okay.
Q. (By Ms. Clark) So -- so my question to you is: Since she worked in the GIS department in Columbus office, you didn't have any personal knowledge of her responsibilities or her job performance, did you?

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A. I had personal knowledge of her job responsibilities, and the reason that I was able to acquire that personal knowledge is because I spent maybe a couple of days in the Columbus office with her supervisor.
Q. And how often did you spend a couple days in the Columbus office?
A. No. I -- this was one -- one trip. I mean, it wasn't an extended trip. It wasn't once a month or anything like that.
Q. Okay. And when did that occur?
A. I would have to say that probably was in 2002; but again, this is just a guess. I don't --
Q. Okay.
A. I don't remember the exact date.
Q. Okay. Now, you also stated that Hugh Whiting told you that Jerri had been selected because of her connections within the firm. Did she have connections within the firm, to your knowledge?
A. I didn't know what kind of connections she had. Obviously she did.
Q. Okay. Now, in your statement, Exhibit No. 17, in Paragraph 3 you write -- or you wrote that Mr. Whiting told you that a major part of the decision to hire or place Jerri in the GIS manager position was

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based on her tenure with Jones Day; and he added that she'd worked for Jones Day for more than ten years. Do you see that?
A. I see that.
Q. Do you have any reason to doubt that she actually worked for Jones Day for over ten years at the time this statement was drafted?
A. Since he said it, I -- I took him at his word.
Q. Okay.
A. I -- I don't know.
Q. Okay. And then you went on to state that on October 22nd, Mr. Richardson assured you that the GIS manager position was completely new and that your current position as technology support specialist would stay intact. Do you -- you wrote that?
A. Yes. And that was consistent with the position that Stacey Brown told me to place on my resume, which I did.
Q. Okay. But you noted changes in that your BlackBerry had been removed and there were changes in the GIS manager distribution list. Is that what you told Mr. Williams?
A. Yes.
Q. Now, did you -- how do you characterize the decision to place Jerri Del Riesgo in the GIS manager

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position?
A. Rephrase your question.
Q. Okay. In this lawsuit you allege that Jones Day discriminated against you based on your race, correct?
A. Correct.
Q. And I -- I want to understand the nature of your allegations.
Is it your allegation or your belief or based on your knowledge, however you want to characterize it, that you were demoted when Jerri Del Riesgo was placed in the GIS manager position?
A. I was definitely demoted, yes.
Q. Okay. Is there anything else about that decision that you believe to be discriminatory, other than the fact that you view it as a -- a demotion?
A. The fact that I had superior knowledge, superior experience, that I was already doing the job, and that a white female, former secretary who had never ran a technology department before, who came in and I had to train on many technologies, on many things regarding the infrastructure -- she was not equipped. She was not qualified for the position, nor even in the -- the interview process was there anything that -- what would allow a individual to test qualifications.

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Q. Okay. Now, I understand that's why you believe you were discriminated against. And we'll --
A. That's why I know I was discriminated against.
Q. Okay. Why you know you were discriminated against. But right now I just want to make sure I understand your claim, and it's your belief that you were demoted when Jerri Del Riesgo was placed as the GIS manager because that position had been yours previously. Is that right?
A. I had been the GIS manager. I was the GIS manager for the Houston office for almost three years.
Q. Okay. Now --
A. And when Jerri was sent to the Houston office, she took over my position.
Q. Now, and what position then did you assume when -- once Jerri took over your position?
A. The position that Stacey Brown told me to write on my resume, which was technology support specialist.
Q. So after Jerri became the GIS manager, it's your belief, your knowledge, that you then became the technology support specialist.
A. It's my belief that I was demoted, and I know that I was demoted based on the major changes that took place. And seeing as though that that's the title that Stacey Brown told me to put on my resume, I would say

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"yes," that's what I became.
Q. Okay. And how did your job responsibilities change after Jerri Del Riesgo became the GIS manager?
A. They changed tremendously.
Q. Yeah. And I'm asking you how.
A. Okay. To start with, she took over all budgetary responsibility.
Q. So you no longer were responsible for budgetary responsibilities.
A. That is correct. Jerri -- well, obviously you see in the -- in the documents she assumed my BlackBerry. She also took over all other administrative and managerial functions, such as approving invoices, handling new hires, handling departures, ordering all equipment. These were things that Jerri assumed.
Q. And what did -- and what were your responsibilities after she came -- became the GIS manager? What did you do?
A. Initially what I did was packed up the entire technology department for the Houston office while she was in meetings and while she was doing the things that I would have normally done.
Q. Okay. So while --
A. So --
Q. While she was in meetings, you were packing up?

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I'm -- I want to make sure I understood what you said.
A. I packed up all of the -- the packing for the department.
Q. For the move?
A. That is correct. Because she came around the time that the move was taking place.
Q. Okay. So Jones Day moved offices in November or thereabouts, 2003, correct?
A. That is correct.
Q. And so you were charged with packing up the technology in the department in preparation for the move.
A. That's correct. I did all the -- the labor, the hard labor.
Q. Okay. Lifting boxes?
A. Sure.
Q. Packing boxes?
A. Uh-huh.
Q. "Yes"?
A. Yes.
Q. You didn't have any support?
A. No. Sure didn't.
Q. If Jerri had not been placed as the GIS manager, would those responsibilities have still been yours? Packing up the technology department?

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A. No.
Q. Who would have assumed those responsibilities if Jerri was not the GIS manager?
A. I can only assume -- don't know for sure, but we would have had some individuals down here to help out with the move. Because the things that she was -- that she assumed in the sense of meetings, handling the administrative part --
Q. Uh-huh.
A. -- those were things that I would have handled.
Q. Okay.
A. Just like I did when we expanded to the 68th floor.
Q. Now, you -- in this complaint you asked Mr. Williams for the opportunity meet face-to-face with him when he next came to Houston on November 14th and 17th. Is that correct?
A. That's correct.
Q. And did you, in fact, meet with Mr. Williams?
A. Yes, I did.
Q. Okay. Now, you testified that you believe that Jerri Del Riesgo was not qualified for the position, correct?
A. She did not have the kind of qualifications that I had. I had superior qualifications for the

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position.
Q. Okay. And I believe you explained or gave me reasons why you believe that the decision to place her in this position was based on your race; and you told me it's because you had superior knowledge, that a white female former secretary was placed in the position that you had to train, that she was not equipped or qualified for the position. Is that your testimony?
A. I did say that, yes.
Q. Okay. Now, just so that the record is clear -- because you provided that explanation to a different question -- why do you believe that the decision to place Jerri in the GIS manager position was based on your race?
A. I know that it was based on my race because I had already -- I was already the manager in place. I had done the job successfully for three years. Most of that time I was by myself. I had superior knowledge. I -- superior knowledge, understanding, much more experience than Jerri had; but I -- I know that Kevin -- who when we're talking about communication, as I pointed out, it was very difficult. I would try to communicate with Kevin. Kevin has problems with -- with blacks. He has problems with blacks and females. Primarily blacks. And they wanted a white front.

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Q. I'm sorry.
A. A --
Q. Wanted a what, now?
A. A white front, a white presence. A different image, a white image.
Q. And -- and who is "they"?
A. Kevin.
Q. Okay. You believe -- you know -- because I don't want to get into an exchange about belief and knowledge. It's your testimony that Kevin wanted a white image or a white front in the department.
A. Yes. That position was, quote, unquote, high profile; and for a high-profile position, yes.
Q. Okay. Now, why do you believe -- okay. Why do you testify that Kevin wanted a white image in that position? What's the basis of -- of -- I'm trying to stay away from "belief" because I don't want us to get caught up on words.
A. Okay.
Q. But --
A. Rephrase the question, please.
Q. Sure. What's the basis for your testimony that he wanted a white image?
A. The basis is some of the things that I had mentioned to you in our last deposition, was the fact --

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the way he treated blacks. He treated us differently. The -- the hostility, the anger, the way he would talk to myself and other blacks. The way he ran blacks off. The way he ran them out of the firm.
Q. Okay.
A. So it was apparent -- when I was already doing job, that I had a superior experience -- that this was totally based on my race.
Q. Okay. Now, did you -- had -- you had not completed your four-year degree at the time you interviewed, correct?
A. That's correct.
Q. And Ms. Del Riesgo had not either, correct?
A. That's correct.
Q. Now, when you say that you had more experience in this position, to what are you referring?
A. What I'm referring to is experience as a technology manager. I had been a former technology manager. I was the technology manager for Jones Day. I was the technology manager for Bayco Gibson. I -- my title at Coastal was systems administrator; but I ran that technology department, 130 users. I had an assistant. Jerri did not have that type of experience.
Q. Okay. And -- and you -- okay.
Now, did you have a meeting with

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Mr. Williams?
A. Yes, I did.
Q. And who was present in the meeting?
A. Stacey Brown.
Q. And did you tape the meeting?
A. No, I did not.
Q. Have you taped any meetings with Mr. Williams?
A. I taped one meeting, and you should have that tape.
Q. Okay.
A. I believe that's been provided to you.
Q. Okay. Did you tape the meeting with -- how many meetings did you have with David Williams?
A. I only had one meeting with him physically. The other meeting, it was really a phone conference.
Q. Okay. And I asked you did you tape the meeting with David Williams, and you said "no."
A. The meeting that -- the initial meeting that I had with David Williams and Stacey Brown, I did not tape that.
Q. Okay. The meeting -- was that the telephone conference?
A. No. The -- he was physically here in -- in Houston.
Q. Okay. So you met with David Williams after you

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submitted your complaint, your written complaint, Exhibit No. 17.
A. That is correct.
Q. Okay. And in that meeting, Stacey Brown was in attendance.
A. Yes.
Q. And it's your -- and you didn't tape that particular meeting.
A. No.
Q. You taped another meeting.
A. I taped the phone conference.
Q. When did that phone conference occur?
A. I don't recall the exact date.
Q. Okay. Was it --
A. But --
Q. -- before or after the decision to place Jerri in the GIS manager position had been made?
A. Well, everything that we're talking about was -- was after. I mean, because I -- I didn't get in touch with David Williams until after --
Q. Okay.
A. -- the decision.
Q. Well, did the conversation that you taped -- did it occur after you -- you met physically in person with David Williams?

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A. Yes, it did.
Q. Okay. When did -- after you met with him in person with Stacey Brown, when did you next speak with him?
A. I -- I can't tell you exactly how -- how long it took, but it was several weeks afterwards.
Q. You -- you recall several -- several weeks later you had a telephone conference with David Williams, and you taped that call.
A. That is correct.
Q. Did you inform him that you were taping the call?
A. No, I did not.
Q. Why not?
A. Why?
Q. Why not?
A. I just did not.
Q. Do you believe that's deceptive? Would you -- would you characterize that as being deceptive?
MR. PADGETT: Object to the form of the question.
A. I didn't see anything deceptive about it.
Q. (By Ms. Clark) You're aware of the Jones Day policy regarding taping conversations?
A. Not specifically.

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Q. Well, generally what do you know of the Jones Day policy regarding tape-recording conversations?
A. It's policy that I -- I don't recall even looking at.
Q. Okay.
A. I mean . . .
Q. Well, I'm just asking you. You -- you testified that you didn't recall the policy specifically. What about the policy do you recall?
A. I don't even recall that -- honestly, that there -- there was a policy.
Q. Okay.
A. I -- I just don't remember. I don't recall.
Q. Okay. Did you ever ask whether it was appropriate or in violation of any policies to secretly tape-record a conversation?
A. No, I did not ask.
Q. Okay. Did you believe that David Williams or Stacey Brown taped your conversations without your knowledge?
A. They probably did. I don't know.
Q. Okay. Would it surprise you to -- to know that -- that they did not tape your conversations?
A. I didn't know that.
Q. Okay.

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(Slaughter Exhibit No. 18 was marked.)
Q. (By Ms. Clark) You've been handed what's been marked as Exhibit No. 18.
MR. PADGETT: Can we take break for a minute?
MS. CLARK: Sure. Well, I'd -- I'd like to break for lunch at 11:45 and --
MR. PADGETT: That's fine. I just need to take a break for a minute.
MS. CLARK: Okay. Sure.
THE VIDEOGRAPHER: Going off the record. The time is 11:25.
(Recess from 11:25 a.m. to 11:33 a.m.)
THE VIDEOGRAPHER: Going back on record. The time is 11:33.
Q. (By Ms. Clark) Okay. Before the break, Ms. Slaughter, I'd handed to you what's been marked as Exhibit No. 18. Are you aware of the policy regarding tape-recordings?
A. No. I mean, I see it in the -- in the document; but I wasn't aware of it.
Q. So you weren't aware that your secretly tape-recording your conversation with David Williams was against the firm's policy?
A. No.

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Q. What was discussed during the conversation with David Williams that occurred over the telephone that you taped?
A. It was -- it wasn't really a conversation. He was just explaining why the decision was made to take my position.
Q. Okay. What did you discuss with him when you met with him in person on either November 14th or November 17th.
A. I discussed with him the fact that my position was taken by Jerri Del Riesgo, someone less qualified. I discussed quite a few things with him.
Q. Okay. And it was your understanding that after that conversation, he would take the information that you provided and conduct an investigation.
A. That is correct.
Q. Okay. Did you transcribe the tape?
A. Did I transcribe the tape?
Q. Yes.
A. No.
Q. Do you have any type of transcript of the tape?
A. I don't, no.
Q. After you tape-recorded the conversation without their knowledge, did you ever go back to Mr. Williams and inform him that you had a tape of their conversation?
A. No.
Q. Did you ever tell Stacey Brown that you had tape in your possession of the conversation?
A. Not that I recall.
Q. Okay. Now, you -- you testified that during this conversation, Mr. Williams informed you of the reasons why Jerri was selected for the GIS manager position, correct?
A. He told me -- yes. That -- that's correct.
Q. Okay. Did he inform you that Scott Cowan and Mark Metts had selected and ranked Jerri first for the GIS manager position?
A. I recall him saying something like that.
Q. Okay. Did he tell you that of the four people you interviewed with, including Scott Cowan and Mark Metts, all four had ranked you last? Third?
A. I believe he told me that, as well.
Q. Okay. Now, there was another candidate that applied for the position, correct?
A. There was someone else, yes.
Q. Who was the other person who applied for the position?
A. I believe her name was Mary Adams.
Q. Okay. And what is her race?

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A. I don't know.
Q. Okay. Do you -- have you ever met her?
A. I've met her, but it's kind of hard to tell.
Q. Okay.
A. She's not black.
Q. Is she --
A. I know that.
Q. -- Caucasian? Does she appear Caucasian to you?
A. She could be. I -- I don't know.
Q. Okay.
A. I really don't know what she is.
Q. Well, do you know Jerri's -- Del Riesgo's race?
A. Yes.
Q. And how -- how do you know that?
A. Because she told me.
Q. Okay. Well, what did she --
A. I worked with her.
Q. I'm sorry.
What did she tell you about her race?
A. She told me that she was white.
Q. And how did that statement come up in a conversation?
A. I don't recall. We had lots of conversations. I can't remember.

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Q. But it -- as you sit here today under oath, you're unsure whether or not Mary Adams is Caucasian.
A. I'm not sure what nationality she is.
Q. My question is: As you sit here today, you're not sure whether or not she is Caucasian. That's -- that's my question.
A. I'm not sure what nationality she is.
Q. She wasn't selected for the position, regardless of whether she's Caucasian or not. Mary Adams.
A. Right.
Q. Did you believe she should have been selected for the position?
A. Did I believe that she --
Q. Yes.
A. No. I know that I was already doing the job, and I should have been able to continue to do the job.
Q. Okay. After you taped the conversation with David Williams and Stacey Brown during which they provided the results of -- or during which David Williams provided the results of his investigation, what, if any, additional action did you take regarding the decision to place Jerri in the GIS manager position?
A. What -- rephrase your question.
Q. Okay.

A. "Action."
Q. Was --
A. What do you mean by that?
Q. Did you file any formal complaints? Did you file a complaint with the EEOC?
A. Yes, I did.
Q. Okay. And did the EEOC issue a right to sue?
A. Yes, they did.
(Slaughter Exhibit No. 19 was marked.)
Q. (By Ms. Clark) Do you recognize Exhibit No. 19?
A. Yes.
Q. And is that your signature at the bottom?
A. Yes.
Q. And it states above your signature: "I declare under penalty of perjury that the foregoing is true and correct."
Do you see that?
A. Yes.
Q. And it's -- and it's dated December 11, 2003.
A. Okay.
Q. Is that right?
A. That's right.
Q. And so you understood that the information you provided to the EEOC was sworn -- sworn testimony like

the testimony you are giving today, correct?
A. Correct.
Q. Okay. Now, refer with me to what's been marked or identified as No. 8. Can you read that sentence to me?
A. "I am African-American. Ms. Del Riesgo is white. Mr. Richardson is white."
Q. Okay. Now, did you include this alle- -- this statement of testimony in your EEOC charge to explain why you believe you were discriminated against based on your race?
A. Rephrase your question.
Q. Sure. Why did you testify that you're African-American, Ms. Del Riesgo is white, and Mr. Richardson is white?
A. Because I've been discriminated against.
Q. Okay. And that's clear to you based on the fact that Jerri and Kevin are white.
A. Not just those things.
Q. Right.
A. There's a series of things that we've already discussed.
Q. Right. In addition to what you've told me about Kevin in the last meeting and today, the fact that he's white and Jerri's white is part of the reason why

you believe you were discriminated against based on your race.
A. I was discriminated against because I am African-American.
Q. Okay. Now, as the -- and you -- when you worked, according to you, as the GIS manager or as the technology support specialist, in those roles did you have access to system documents and system e-mails?
A. I did not have access to system e-mail.
Q. Okay. Did you have the authority to go into a lawyer's or a staff employee's or anyone's e-mail or Word documents in your role as either technology support specialist or what you've testified to as GIS manager, in those positions?
A. My role required me to -- in building workstations and configuring workstations, I had to log in as the user, set up their e-mail --
Q. Uh-huh.
A. -- replicate their e-mail.
Q. Okay. And when you would troubleshoot -- and if -- if someone had a problem with their e-mail or with Word documents and they called to you, you could get on the system or get on their computer as if they were, by logging in as them. With their permission, of course.
A. Of course, yes. This involved at that

particular time physically going to their office --
Q. Okay.
A. -- to do so.
Q. Okay. And when you say this "particular time," when -- when did -- when did you have to physically go to the office or to the cubicle or to the workstation?
A. You ask about fixing and repairing machines. My point is when you had to do that, you had to go to their office --
Q. Okay.
A. -- to do so.
Q. Right. But -- but I -- I guess what I'm trying to ask you is: In your role as what you've characterized as the manager or the technology support specialist, did you have the ability to go into a user's e-mail address and -- and a user's e-mail account?
A. No.
Q. You -- you didn't the authority or the rights to do so.
A. The only time that you could do that is with the person's -- if they had a problem with e-mail.
Q. If they had a -- if -- if they gave you permission.
A. That's right.
Q. Okay. But I'm -- I'm stating the ability to do

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it. I know it would be a violation of policy to do it without permission. But the ability to do so, to go into someone's e-mail -- you had the ability to do so. You just may not have had the approval, permission, or authority to do so. Do you agree with that?
A. That's not something that I would do without approval or someone's authority.
Q. Right. Because to -- because to do so would be a violation of policy.
A. That is correct.
Q. Okay. Did you ever access any of Jerri's documents?
A. Never did.
Q. Okay. Did you ever provide any of -- did you have in your possession any of Jerri's documents?
A. Any of Jerri's documents? Do I have in possession --
Q. Yes. Did --
A. -- right now any of her documents?
Q. Right.
A. I don't have any of those in my possession.
Q. Okay. Did you ever -- did you ever have them in your possession at any time, any of her confidential documents?
A. Any of her confidential documents?

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Q. Yes.
A. Such as? I mean --
Q. Any documents. And of -- any of Jerri's documents.
A. Any e-mail from Jerri that she left behind?
Q. Uh-huh. Anything. Do you have e-mails that she left behind?
A. I don't have them right now.
Q. Okay. Where are they now?
A. They were -- many of them were given to my lawyer --
Q. Okay.
A. -- as part of discovery.
Q. Okay. Now, did you have the right to give the e-mails that Jerri Del Riesgo left behind to your attorney?
A. She left them behind.
Q. But -- but did she leave them behind at Jones Day?
A. Yes.
Q. And -- and you understand that documents, equipment, technology, what have you, that is housed at Jones Day is Jones Day's property, correct?
A. Exactly. Yes.
Q. Okay. Did you seek permission from anyone to

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provide copies of Jerri Del Riesgo's e-mails to your attorney? Were you given that permission?
A. These documents were left behind in the ISS department.
Q. Okay. But -- but you don't own the ISS department, do you?
A. No, I don't own the department.
Q. Okay. Now, my question is: Did you ask or did you get permission from anyone at Jones Day to copy documents that Jerri Del Riesgo left behind in the ISS department to give to your attorney? Did you get anyone's approval to do that?
A. Did I get anyone's approval, no.
Q. Okay. Do you agree with me that your providing documents that did not belong to you to someone outside of Jones Day without permission is a violation of policy?
MR. PADGETT: Object to the form of the question.
Q. (By Ms. Clark) You can answer.
A. Not in the context of discovery.
Q. Okay. So it's -- it's your belief that since you are suing Jones Day, you have the right to go into its system and print documents that did not belong to you to give to your lawyer.

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A. I did not do that.
Q. Okay. You testified that you gave to your -- you -- you gave to your lawyer documents, e-mails, that Jerri Del Riesgo left behind in the ISS department. That's what you testified to, correct?
A. You -- but you just said go into somebody's to do so.
Q. Okay. The ISS department belongs to Jones Day, correct?
A. Correct.
Q. Okay. Now, isn't it true that your going into the ISS department, retrieving e-mails or any documents that Jerri Del Riesgo left behind, and providing them to your lawyer without permission is a violation of policy?
A. These documents that are -- were left behind in the technology department, not in the context of discovery, no.
Q. Okay. So I want to make sure I understand. Because you are suing Jones Day, that gives you the right to go into the ISS system and retrieve documents that were left behind -- documents or e-mails that were left behind to give to your lawyer, that's okay because it's -- it's in the context of discovery.
A. I did not go into the ISS system. That's what I want to clarify.

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Q. Okay. You went into the -- you testified that you went into the ISS department, and I want to make sure --
A. I work in the ISS department.
Q. Okay. So in the ISS department at Jones Day -- it's not your department, correct?
A. That is correct.
Q. Okay. Is it your belief that you have the right because you've instituted litigation against Jones Day to take documents out of the ISS department that Jerri Del Riesgo left behind, according to you, to give to your lawyer, that you have that right now?
A. There have been several documents that I have provided, all of which came from the ISS department.
Q. Okay.
MS. CLARK: And move to strike as nonresponsive.
Q. (By Ms. Clark) I understand that you've provided documents from the ISS department to your lawyer. I want to make sure I understand what you're telling me.
Isn't it true that providing documents from the ISS department to someone outside of Jones Day, whether it's your lawyer or anyone else, without permission is a violation of policy?

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MR. PADGETT: Object to the form of the question.
Q. (By Ms. Clark) You can answer.
A. Rephrase the question.
Q. Okay. Isn't it true that providing documents out of the ISS department to your lawyer or anyone else outside of Jones Day without permission is a violation of policy?
A. If someone left the documents behind, they obviously were not viewed as confidential documents to them.
Q. But I didn't ask you about whether they were confidential or not. I didn't -- I didn't have a qualifier on my --
A. Uh-huh.
Q. -- my question. And I'll repeat it for you. Isn't it --
A. Please do.
Q. Sure. Isn't it true that providing documents out of the ISS department to your lawyer or anyone else outside of Jones Day without permission is a violation of policy?
A. All of the documents that have been provided have been provided without permission.
Q. Okay. And you -- and as you -- and you don't

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believe that that's a violation of policy.
A. It's part of discovery.
Q. So do you believe it's a violation of policy?
A. Which policy are you talking about?
Q. The policy at Jones Day that prohibits you from taking any of Jones Day property and providing it to someone else outside of Jones Day without approval.
A. Well, that would mean every document that you have.
Q. I'm not qualifying it. That's not a violation of policy to you?
A. I'm not sure I understand the question, really.
Q. Okay. What -- what part of the question don't you understand? I want to make sure -- I'm asking you about violation of policy. And I -- I'm trying to make --
A. Do you have a specific policy?
Q. I'm asking you your knowledge.
A. Uh-huh.
Q. Okay? Now, I just want to know your understanding about your actions during this litigation and as an employee of Jones Day.
So without my providing you a specific policy, I'm asking you whether or not it was a violation of policy for you to take documents out of the ISS

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department that were left by anyone and provide those documents to your lawyer without permission of anyone at Jones Day. Was that a violation of policy?
A. I'm not sure.
Q. Did Jerri Del Riesgo ever provide documents to you?
A. Yes.
Q. And what did she provide to you?
A. She provided several things. I have a lot of stuff that she provided via e-mail and documents that she left behind.
Q. Okay.
(Slaughter Exhibit No. 20 was marked.)
Q. (By Ms. Clark) You've been handed what's been marked as Exhibit No. 20; and I want to refer you to the bottom right-hand corner of the document and refer you to the number that appears, "000043."
A. Uh-huh.
Q. And I'll represent to you that that is a notation placed on this document by your attorney or one of his assistants --
A. Okay.
Q. -- of the documents that he provided to me.
A. Uh-huh.
Q. Do you recognize Exhibit No. 20?

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A. **No, I do not.**
Q. How is it that you came to provide this document to your lawyer to provide to me?
A. **I assume it's a document that I gave to him.**
Q. Sure. I under- -- I know it's a document you gave to him.
A. **Uh-huh.**
Q. I'm asking you: How did you come into possession of this document, this letter of hardship prepared by Jerri Del Riesgo?
A. **Because she left it behind.**
Q. Okay. And this is a -- this is an example of one of the documents that she left behind that you took out of the department and gave to your lawyer; is that right?
A. **That would be correct.**
Q. And -- and you're aware that you didn't have the right to provide this document to your lawyer without permission. You're aware of that, aren't you?
A. **Not really, no.**
Q. So you think it's appropriate for you to provide what is clearly a confidential document by Jerri Del Riesgo -- Riesgo to your lawyer without permission?
A. **This isn't marked "confidential."**
Q. It -- it's a letter -- well, did -- would it

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be -- would it make it -- do you believe the document needed to be marked "confidential" for you to believe that it was inappropriate to send it to your lawyer?
MR. PADGETT: Object to the form of the question.
MS. CLARK: I'm just --
Q. (By Ms. Clark) You can answer.
MR. PADGETT: I mean, if you're going to argue with the witness, that's fine. I just want to make clear that we're going to object to any questions in such an argumentative form.
MS. CLARK: Okay. It's lodged for the record.
Q. (By Ms. Clark) You can answer.
A. **Rephrase the --**
Q. The need --
A. **-- question.**
Q. The -- this document needed to be marked "confidential" in order for you to know that you didn't have the right to send it to your lawyers?
A. **I didn't read the document.**
Q. Okay.
A. **I mean, the first -- the first paragraph. This is the first time I've read the document.**
Q. Okay. So is it fair to say that you just took

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all of her documents and gave it to -- all of the documents she'd left behind in the ISS department at Jones Day, you just took them all and provided them to your lawyer?
A. **No. That's not fair to say.**
Q. But you did provide this one.
A. **That's correct.**
Q. Okay.
MS. CLARK: Let's take a break for lunch.
THE VIDEOGRAPHER: Going off record. The time is 11:57. This ends Tape No. 1.
(Lunch recess from 11:57 a.m. to 1:10 p.m.)
THE VIDEOGRAPHER: Going back on a record the time is 1:10 p.m. Tape No. 2.
Q. (By Ms. Clark) Ms. Slaughter, you're aware that you're still under oath.
A. **Yes.**
Q. Okay. Before the break we discussed your applying for the GS -- GIS manager position in the fall of 2003. Do you recall that?
A. **Yes.**
Q. And you testified that you submitted a resume and that you asked for a copy of the manager GIS job description. Do you recall that?

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A. **Correct.**
Q. Okay. Now, up until that point had there -- was there an official title of GIS manager in the Houston office?
A. **Was there an official title?**
Q. Was there an official title in the firm's computer system of GIS manager before 2003?
A. **There was the title that was listed in the firm directories.**
Q. Okay. Other than titles listed in the firm directory, to your knowledge, was there an official title in the firm's computer system identified as GIS manager position or manager of global information services?
A. **Are you talk -- I don't really understand your question.**
Q. Okay. Over the course of the deposition, we've identified your eval- -- your performance evaluations in which your title was referenced as technology support specialist. Do -- do you recall that?
A. **Okay. Yes.**
Q. And you've testified, I believe, during this deposition that you were referred to by others in the firm as the manager -- the GIS manager.
A. **Okay.**

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Q. Right?
A. Everyone referred to me as the manager.
Q. Okay. Now, notwithstanding how everyone else referred to you, I'm asking you: To your knowledge, before September, 2003, was there an official title at Jones Day of manager of GIS like there was for technology support specialist? Was there a formal title in the system before September, 2003?
A. I'm not aware.
Q. Okay.
A. I don't know.
Q. Now, you testified that the position was posted in the September 19th, 2003, newsletter. Do you recall that?
A. The Houston Bulletin.
Q. The --
A. Yes.
Q. The Houston Bulletin.
A. Uh-huh.
Q. Now, did that posting occur before or after you met with Kevin Richardson during which he told you about this new position -- or about the position?
A. I believe this occurred after.
Q. The posting occurred after?
A. Yes.

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Q. Okay. So he told you about the position, and then later you saw that the position was posted.
A. If I remember correctly, he told me one day and it was posted the next day.
Q. Okay.
(Slaughter Exhibit No. 21 was marked.)
Q. (By Ms. Clark) You've been handed what's been marked as Exhibit No. 21.
A. Okay.
Q. Do you recognize Exhibit No. 21?
A. Yes.
Q. Okay. Is this -- what is Exhibit No. 21?
A. This is one of our weekly -- the weekly bulletin for the Houston office dated September 19th, 2003.
Q. Uh-huh. And if you'll refer with me to the second page.
A. Okay.
Q. Is this the GIS manager position posting that you referred to earlier?
A. Yes.
Q. Okay.
(Slaughter Exhibit No. 22 was marked.)
Q. (By Ms. Clark) You've been handed what's been marked as Exhibit No. 22. Do you recognize Exhibit No. 22?
A. Yes.
Q. And what is it?
A. It's a job description for the manager of global information services department.
Q. Was this the job description that was given to you when you requested a copy of the job description?
A. I did not get a copy of the job description right away.
Q. Uh-huh.
A. But this looks -- this looks similar to it. I mean, it -- it looks like it is.
(Slaughter Exhibit No. 23 was marked.)
Q. (By Ms. Clark) You've been handed what's been marked as Exhibit No. 23. Do you recognize Exhibit No. 23?
A. Yes, I do.
Q. Okay. What is Exhibit No. 23?
A. It's a job description for the technology support specialist.
Q. I believe you testified that you'd not reviewed or received a copy of this job description before this litigation started. Is that correct?
A. I had not seen this job description, this particular one that we're talking about right now, prior to meeting with Stacey --
Q. Okay.
A. -- to ask for -- or to -- to find out why my job was being taken away from me.
Q. Okay. Excuse me. Thanks for that clarification.
So the meeting with Stacey Brown that occurred after you met with Kevin Richardson and he told you that this GIS position would be posted, you went to Stacey Brown and asked for a copy of the technology support specialist job description?
A. I asked her -- I said -- I wanted to know -- wanted to get a job description for the GIS manager --
Q. Uh-huh.
A. -- the position that I was already filling. And at that time she told me that to put -- as I told you before, to put the technology support specialist --
Q. Uh-huh.
A. -- on my resume when I applied for the position. So my question to her was: What was the difference between the two positions? Because I was -- I was already the manager. So that's when I -- I saw this job description.
Q. Okay. And did she identify the difference between two positions?

A. That -- that -- as I said before, she could not provide any differences.
Q. Okay. When did you first receive a copy of the manager job description?
A. I believe it was the same time. I mean, it -- it was the exact same visit --
Q. Okay.
A. -- with Stacey.
Q. So she asked -- you asked for the job description for the manager and for the technology support specialist, and she provided both copies to you.
A. I asked for the job description for the manager.
Q. Right.
A. And she gave me this and said what she was going to do was to compare the two --
Q. Uh-huh.
A. -- and try to see what the difference was.
Q. To answer your question.
A. It's to -- to answer my question as to --
Q. -- the difference.
A. -- why exactly.
Q. Okay. And so -- but that meeting you received both copies of the job descriptions.
A. As far as I recall.

Q. Okay.
(Slaughter Exhibit No. 24 was marked.)
Q. (By Ms. Clark) You've been handed what's been marked as Exhibit No. 24. Do you recognize this document?
A. No.
Q. When was the first time you saw this document?
A. Today.
Q. Okay. This was not one of the documents that you provided to your attorney at some point?
A. Not that I recall.
Q. Now, after Ms. Del Riesgo was placed in the manager position, did your salary change, the amount of money you earned, was it decreased?
A. My base salary did not change.
Q. Okay. Was there anything else that changed about your salary?
A. What changed was that fact that I didn't -- didn't have to -- to work as many hours. So -- but no, my salary did not change.
Q. Did your hours change?
A. I think I kept the same hours.
Q. Did your work location change? Did you report to the same area?
A. It's kind of hard to answer that because that

was around the same time that we moved. And so the office that I was supposed to be getting and that I was told I was going to get, I did not get; and I -- I'm in a work area.
Q. You testified earlier that you worked with Jerri Del Riesgo and that -- and you knew her and y'all had conversations. Do you recall that?
A. Yes.
Q. Did you get along with her?
A. For the most part. It was very difficult at first.
Q. To -- to work with her when she was in the position you believed you should have been in.
A. That is correct. The -- to work with her because she -- she took the position that I had previously.
Q. Okay. But you followed her directives as your supervisor, correct?
A. I -- I did follow some of her directives. As I pointed out before, her experience was very limited. So she referred to me for a lot of things.
Q. For example, what did she refer to you for?
A. She had never really worked on back-in infrastructure as it relates to servers, server maintenance, applications such as pcAnywhere, Equitrax,

phone system. There were quite a few areas that she had not -- she wasn't familiar with, and she pointed out that she did not have to do those things when she was in Columbus.
Q. And you assisted her in your role as technology support specialist in those areas where you felt she was deficient; is that correct?
A. I trained her in those areas.
Q. And how long did it take for you to train her?
A. When Jerri left the firm, there were still areas that she was not familiar with.
Q. And when did she leave?
A. That was in August, maybe, of 2004.
Q. Okay. Did you --
A. July or August.
Q. Did you complain to Kevin Richardson or anyone regarding Jerri's performance?
A. When you say "anyone" . . .
Q. I'll clarify.
A. Okay.
Q. Did you complain to Kevin Richardson or Hugh Whiting regarding Jerri's performance?
A. No, I did not.
Q. Okay. In your lawsuit you allege that Jerri was paid more than you. Do you recall that?

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A. **Yes.**
Q. Why do you -- why did -- why do you allege that Jerri was paid more than you?
A. **Rephrase your question.**
Q. Well, what's the basis -- how do you know she was paid more than you?
A. **How do I know that --**
Q. Yeah.
A. **-- she was paid more than me?**
Q. Yes.
A. **Because either Jerri told me or someone told me at the time. I don't -- I don't remember. That was so long ago.**
Q. But if you were in different positions, you would expect there to be a difference in salary, wouldn't you?
A. **I was the --**
MR. PADGETT: I'm going to object to the form of the question.
Q. (By Ms. Clark) You can still answer.
A. **I was the manager originally.**
Q. Uh-huh.
A. **I was not paid the same base salary that Jerri was.**
Q. When -- when she became the manager.

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A. **Exactly.**
Q. Had you worked at that firm as long as she?
A. **I had not worked for Jones Day as long as she had. Overall I had a lot more experience --**
Q. Okay.
A. **-- with other companies and other firms.**
Q. Okay. What was Mary Adams' title? Do you know?
A. **I don't know.**
Q. Okay. But you didn't have any problems working with her or anything, did you?
A. **No, I did not.**
Q. You didn't file any complaints with -- against her?
A. **No, I did not.**
Q. Have you told me all the reasons why you believe you were demoted from the GIS manager based on your race? I'm not asking you to repeat everything you've told me, but I just want to make sure that I've gotten your full answer.
A. **I've -- I know I've told you quite a few things, and I think for the record I'd like to reiterate those things to make sure that I've covered all bases.**
I was the GIS manager for the Houston office. I had worked as the GIS manager for the Houston

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office for almost three years. I had the knowledge and the experience and had effectively performed in that capacity. Jerri Del Riesgo was hired to take over my position. Jerri did not have the knowledge or experience that I had; and according to Hugh Whiting, the reason she was given the position was because of her connections with the firm. There are several things that I've pointed out before that indicate Kevin's bias towards blacks and women; but with me being a black woman, there were several things that he did. And I think we've already went over those -- those things --
Q. Yes.
A. **-- before.**
Q. In your initial disclosures you identified individuals who you believe have knowledge of the facts of this case and we talked about some of them when we met at the end of last month and so I don't want to go back over those, but I want to ask you to tell me: Who is Robert Leidich?
A. **Robert Leidich?**
Q. Uh-huh.
A. **He's a former partner of Bayco Gibson, and he was instrumental in the merger. He had a lot of responsibility as far as the merger talks and anything related to the merger on an administrative level.**

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Q. Uh-huh.
A. **He was also a partner of Jones Day.**
Q. What does he know about this lawsuit?
A. **He doesn't know anything about it.**
Q. Okay. Have you talked about this lawsuit with him?
A. **No, I have not.**
Q. Okay.
MS. CLARK: Can we go off the record for just a minute?
THE VIDEOGRAPHER: Yes, ma'am. Going off the record. The time is 1:31.
(Recess from 1:31 p.m. to 1:32 p.m.)
THE VIDEOGRAPHER: Going back on record. The time is 1:32.
Q. (By Ms. Clark) Who is Chris Patterson?
A. **Chris Patterson is a former docket and records manager of Jones Day.**
Q. And what does he know about this lawsuit?
A. **He knows nothing about the lawsuit.**
Q. Have you discussed it with him?
A. **No.**
Q. Have you asked him to be a witness?
A. **No.**
Q. Okay. Is he still employed with Jones Day?

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A. No.
Q. When did he leave Jones Day?
A. I believe it was maybe in 2002.
Q. 2002? Okay.
Zachary Green. Who is Zachary Green?
A. Zachary Green is an account manager for Insight. Insight is one of the companies that we used to purchase equipment, and I established the vendor relationship with Zachary Green back in the -- the late Nineties.
Q. Does he -- does the firm continue to have a relationship with account executive -- I mean, excuse me, with Insight?
A. Yes, they do.
Q. Okay. What does Zachary Green know about this lawsuit?
A. He -- he knows nothing about --
Q. Okay.
A. -- the lawsuit.
Q. Okay. What, if any, knowledge does he have regarding your allegations of race discrimination?
A. He doesn't have any knowledge of that.
Q. Have you discussed this lawsuit with him?
A. No, I have not.
Q. Haven't asked him to be a witness?

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A. No.
Q. Do you -- are you personal friends with Mr. Green?
A. No.
Q. Does he know your background?
A. No. I mean, he knows that -- that I was the director of information technology for Bayco Gibson.
Q. Okay.
A. He knows that.
Q. Okay. Does he know anything about your role with Jones Day?
A. He knows that I was the IS manager for Jones Day and that I ordered all equipment and I had that type of responsibility. He's aware of that.
Q. John Knox. Who is John Knox?
A. John Knox is a phone technician for NextiraOne.
Q. And why is he listed as a person with knowledge?
A. Because John Knox can verify the fact that I was responsible for the phone system; and he can also verify that once Jerri took over my position and I was demoted, that Jerri maintained that vendor relationship. He's also aware that Jerri knew nothing about the phone system.
Q. Did you talk to him about Jerri?

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A. Did I talk to him about Jerri?
Q. Yes. You said that he knows that Jerri knew nothing about the phone system. How do you know that he knows Jerri knew nothing about the phone system?
A. Because he talked to me about it.
Q. And what did he tell you?
A. He just asked me what was going on, why was she communicating with him instead of me. I told him that she had taken over my position, and he went on to say -- well, quite a few questions that she was asking about the system he thought she should know. So --
Q. Did you --
A. -- I ended up having to get involved.
Q. Okay. Did you report that to Kevin Richardson or Hugh Whiting, that you needed to become involved because Jerri couldn't answer -- or Jerri had questions for John Knox and didn't know anything about the phone system?
A. No. I did not report that to them. I mean, seeing as though I knew I had been discriminated against, I wouldn't go to them to report something like that.
Q. Did you report it to David Williams?
A. When David and -- Williams and I met, this was during the time when that information really wasn't

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known. I mean, it was the move.
Q. Okay.
A. And I -- I had -- at that time I really couldn't provide that -- that detailed information --
Q. Okay.
A. -- about her.
Q. Sharon Travis. What does she know?
A. Sharon Travis. She's our Dell account representative or account manager, maybe.
Q. And what does she know about this lawsuit?
A. She knows nothing about the lawsuit.
Q. Okay. Why is she identified as a person with knowledge?
A. Because she can verify my level of responsibility as a buyer for the Houston office of Jones Day.
Q. Okay. Now, she never worked for Jones Day, though, did she?
A. No. She works for Dell.
Q. Okay. And Mr. Knox worked for NextraOne [sic] -- NextiraOne?
A. Right.
Q. Never for Jones Day?
A. I mean, he -- he works for NextiraOne; but he is -- he was our official technician that was in the